



**Fw: Hilcorp NPDES Questions**

**Richard Cool** to: Erin Seyfried

Cc: Hanh Shaw, Cindi Godsey

07/18/2012 10:39 AM

Hi Erin:

We were recently contacted by Hilcorp (last Friday; see emails below) with questions about the Cook Inlet permit and some of their practices and proposals.

Because of potential issue overlap, I wanted you to see their questions and be able to participate in our internal deliberations before we respond.

The Question No. 2 below appears unique and I have not yet talked to Cindi about this new information.

Later.

Rick

----- Forwarded by **Richard Cool**/R10/USEPA/US on 07/18/2012 10:33 AM -----

From: Linda Ward <lward@hilcorp.com>  
To: **Richard Cool**/R10/USEPA/US@EPA,  
Cc: Cindi Godsey/R10/USEPA/US@EPA  
Date: 07/17/2012 04:40 PM  
Subject: RE: Hilcorp NPDES Questions

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Hello Rick and Cindi,

Question No. 1 – Engineering is writing up there proposed changes so more to come on that question.

**Question No. 2**

1) What is the nature (related process and functions) of the tubulars that were removed?  
The tubulars come out of a well that produces oil, and they carry our production emulsion of water and oil. The tubulars are the long “pipes” that connect the oil reservoir to the surface where we process the oil, water and production emulsion. They do develop scale that plugs up the efficiency of the pipes, holes, or need replacing after working for a number of years. They are about 30- 35’ long and they generally are clean on the outside, but have a build up on the inside of the long pipes.

2) What is the typical on-platform cleaning process and how are these tubular washings addressed on board?

Generally, we wash the tubulars with pressure washer and water and the water goes to the deck drains or is used for EOR – depends on the location. No soaps or chemicals are added to the cleaning process. Occasionally, we send the tubulars to shore for full processing at a tubular subcontractor. This tubular subcontractor examines the tubulars fully, removes scale, determines if they can be reused, places patches in some areas if there are only minimal problems, and similar. They inspect, rethread the pipe ends, etc. The contractor has placed the washwater in a tank that has been segregated and nothing else has been added to the washwater.

3) What are the typical pollutant constituents of the on-board washings?

Petroleum residue, scale with petroleum, some residual sand that has come from downhole in an oil well would be the pollutant constituents.

I also have a Question No. 3 that came up since my initial inquiry.

Question No. 3:

We are looking at replacing the Omnipure unit on one of our platforms. The Omnipure is our wastewater treatment system. Based on a review of the permit I don't see that we are required to make an Agency notification. VII. E. states we have to properly operate and maintain our facilities and VII. J. states for planned changes we must give notice if the alterations meets a new source as determined in 40 CFR 122.29(b) or if the alteration could significantly change the nature or increase the quantity of pollutants discharged. We do not feel we meet either of these two element. The system will not be like-for-like because it is a newer model and we will update our facility drawings. Is it correct that it we are not required to make a notification.

Thank You,

**Linda Ward**

Environmental Coordinator

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**From:** Richard Cool [<mailto:Cool.Richard@epamail.epa.gov>]

**Sent:** Monday, July 16, 2012 8:51 AM

**To:** Linda Ward

**Cc:** Cindi Godsey

**Subject:** Re: Hilcorp NPDES Questions

Hi Linda:

Thank you for your inquiry. I will be working with Cindi Godsey, NPDES Permits Unit, to respond to your questions.

Would you please provide some additional details about both situations below.

In regard to No. 1 below (adding temporary overboard point):

- Does this temporary overboard point replace or supplement an existing NPDES-authorized

- discharge? Details if any would be helpful.
- What is the particular NPDES-authorized discharge description/discharge number that this point would accommodate?
- Any related process changes?
- Any new or changed pollutants or pollutant constituents discharged through this point?
- Any commingling of other discharges through this point?

In regard to No. 2 below (tubulars):

- What is the nature (related process and functions) of the tubulars that were removed?
- What is the typical on-platform cleaning process and how are these tubular washings addressed on board?
- What are the typical pollutant constituents of the on-board washings?

I would appreciate it if you would reply to both me and Cindi. Thank you for your help in clarifying the facts about your request.

Rick Cool  
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▼ Linda Ward ---07/13/2012 04:27:39 PM---Mr. Cool, I have two questions for your regarding Hilcorp's NPDES Permit:

From: Linda Ward <[lward@hilcorp.com](mailto:lward@hilcorp.com)>  
To: Richard Cool/R10/USEPA/US@EPA,  
Date: 07/13/2012 04:27 PM  
Subject: Hilcorp NPDES Questions

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Mr. Cool,

I have two questions for your regarding Hilcorp's NPDES Permit :

1. We are looking at adding a temporary over board point on the King Salmon platform . If engineer decides to add the piping and over board point what is the process for informing EPA and obtaining approval?
2. We had to clean several tubulars from one of our platforms and room was tight on the platform so we shipped the tubulars to shore for cleaning . Normally the rinse water would go to deck drainage but we now have the water in tanks onshore at a third party contractor location . We would like to ship the oily water back to the platform and discharge as deck drainage . So is it acceptable to place in our deck drains?

Thank You,

**Linda Ward**  
Environmental Coordinator

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